

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC
Authorized Agent for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886
Nationstar Mortgage LLC d/b/a Mr. Cooper as servicer for
WELLS FARGO BANK, NATIONAL ASSOCIATION, AS
TRUSTEE FOR BANC OF AMERICA FUNDING
CORPORATION, Mortgage Pass-Through Certificates,
Series 2007-E

In Re:

Gary Novello,

Debtor.

Case No.: 18-28300-MBK

Chapter: 7

Hearing Date: March 18, 2019

Judge: Michael B. Kaplan

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:
March 18, 2019 at 10:00 a.m.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor-</i>	<i>Debtor's Attorney-</i>	<i>Trustee-</i>	<i>U.S. Trustee-</i>
Gary Novello 1006 Papen Road Bridgewater, NJ 08807	David A. Ast Ast & Schmidt 222 Ridgedale Ave. PO Box 1309 Morristown, NJ 07962-1309	John W. Hargrave Law Offices of John W. Hargrave 117 Clements Bridge Road Barrington, NJ 08007	U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102

PLEASE TAKE NOTICE that on March 18, 2019 at 10:00 a.m., or as soon thereafter as counsel may be heard, RAS Citron, LLC, attorneys for Nationstar Mortgage LLC d/b/a Mr. Cooper as servicer for WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR BANC OF AMERICA FUNDING CORPORATION, Mortgage Pass-Through Certificates, Series 2007-E, the within creditor ("Creditor"), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at 402 East State Street, Trenton, N.J. 08608, Courtroom #8, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, NJ 08608**, and simultaneously served on Secured Creditor's counsel, **RAS Citron, LLC, 130 Clinton Road, Lobby B, Suite 202, Fairfield, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: February 19, 2019

RAS Citron, LLC
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886
By: /s/ Aleisha C. Jennings
Aleisha C. Jennings, Esquire
Bar ID: 049302015
Email: ajennings@rasnj.com